MHH H

Moritt Hock Harrroff & Horowitz LLP

ATTORNEYS AT LAW

400 Garden City Plaza Garden City, New York 11530

(516) 873-2000 Fax (516) 873-2010 www.moritthock.com

Douglas J. Bilotti

Email: dbilotti@moritthock.com

DEDC SDNY
DOCUMENT
WESTRONICALLY FILED
DOC#:
DATE FILED: 6678

June 4, 2007

VIA FACSIMILE

Judge Naomi R. Buchwald United States District Judge United States District Court Southern District of New York Daniel Patrick Moynihan United States Courthouse 500 Pearl Street, Room 2270 New York, New York 10007 WHITED STATES DISTAGE

Re:

Philip Hopkins, et anno. v. Visual Treasures, LLC, et al.

Case No. 07-cv-03650 (NRB)

Dear Judge Buchwald:

This firm represents the Plaintiffs, Philip Hopkins and Ralph Stevens ("Plaintiffs"), in the above-referenced action, which was removed by Defendants from the Supreme Court of the State of New York, County of New York on May 8, 2007. Pursuant to Your Honor's Individual Practices, I respectfully submit this correspondence requesting a pre-motion conference with the Court. Plaintiffs intend to submit a motion to remand this action to the State Court because that is the exclusive forum of disputes agreed upon by Plaintiffs and Visual Treasures, LLC as set forth in the Consulting Agreements and Security Agreement sued upon herein.

I would also like to bring to the Court's attention that pursuant to 28 U.S.C. §1447(c), the last day that Plaintiffs can serve and file their motion to remand is June 7, 2007. Further, on June 13, 2007, the parties are currently scheduled to attend a private mediation to discuss a global settlement of this matter. Accordingly, it is respectfully requested that the Court extend

Moritt Hock Hamroff & Horowitz 1119

Judge Naomi R. Buchwald United States District Judge June 4, 2007 Page -2-



Plaintiffs' time to file and serve their motion to remand this action through and including June 21, 2007, to allow for both the pre-motion conference and the mediation.

Thank you for your courtesies.

Respectfully submitted,

Douglas J. Bilotti

cc:

Timothy Pierce Kebbe, Esq. William A. Rome, Esq.